



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

December 10, 2007

Ref: EPR-N

Ms Julie K. King, District Ranger
Heber Ranger District
Uinta National Forest
Post Office Box 190
Heber City, Utah 84032

Re: CEQ 20070451; Indian Springs
Road Realignment Draft Supplemental
Environmental Impact Statement, Uinta
National Forest

Dear Ms. King:

The Environmental Protection Agency (EPA) Region 8 has reviewed the Draft Environmental Impact Statement (DEIS) for the Indian Springs Road Realignment Project. In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4371 *et seq.* and the Clean Air Act §309, 42 U.S.C. 7609, EPA offers the following comments for your consideration.

With this DEIS, the US Forest Service (USFS) proposes to relocate the Indian Springs Road from its present location within the Indian Creek drainage to an upland location just east of Strawberry Ridge. The new road will be 1.9 miles long and will be a single lane with 10 turnouts. The existing Indian Springs Road is a local route located on the Heber Ranger District approximately 35 miles south of Heber City, Utah.

Purpose and need

The purpose and need for the USFS proposed action, as stated in the DEIS “*is to reduce adverse impacts to watershed and fisheries impacted by the existing road, provide safe driving conditions and maintain access to Strawberry Ridge from the south.*” EPA concurs with this purpose and need statement, finding it broad enough to evaluate a robust range of alternatives.

Range of alternatives

The DEIS has evaluated three action alternatives. The Proposed Action would

reconstruct the road on Strawberry Ridge and obliterate the existing road and restore the natural characteristics of the Indian Creek drainage; Alternative “A” would reconstruct the road on Strawberry Ridge and obliterate a large portion of the existing road. Approximately 0.5 miles of a dead-end road would remain to allow grazing and recreational access; and Alternative “B” would reconstruct the road on Strawberry Ridge, convert a large portion of the existing road to an all terrain vehicle (ATV) trail and approximately 0.5 miles of a dead-end road would remain to allow grazing and recreational access.

The Proposed Action alternative would significantly reduce the sediment load currently being transported downstream to the Strawberry Reservoir, reduce turbidity and improve water quality in Indian Creek. Alternatives “A” and “B” would still allow for disturbances to occur in the Indian Creek drainage impacting water quality in Strawberry Reservoir and Indian Creek. In addition, in reviewing the EIS, EPA is not fully convinced that all reasonable alternatives have been fully explored. EPA would like to see a more detailed evaluation of why a road could not be constructed outside the designated roadless area and still meet the purpose and need of the EIS. The FEIS should include an explanation of why other alternatives outside the roadless area were rejected.

Inventoried Roadless Area

All three of the proposed action alternatives would impact a portion of a USFS designated roadless area. EPA is concerned that the relocation of this road would impact the status of the current roadless area. The FEIS should clearly describe what actions the USFS will undertake to preserve the status of this area as roadless, e.g. mitigation that the USFS could undertake to offset the impacts of the road placement. Mitigation that would be acceptable would include:

- Restoring existing non authorized roadways in the roadless area to natural conditions to offset the new road construction.
- Restrict potential access and human impacts off the proposed road. This could include restricting dispersed camping opportunities along the proposed new roadway.
- Developing and implementing an education program for forest user on the importance of staying on designated roadways.
- Improved signage.

Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and its alternatives in an EIS, EPA rates this DEIS as EC-2 (Environmental Concerns – Insufficient Information). An “EC” signifies that EPA’s review of the DEIS has identified potential environmental impacts that should be avoided in order to provide adequate protection for the environment. A “2” rating signifies that the DEIS does not contain sufficient information for the EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment. A copy of EPA’s rating criteria is enclosed.

We appreciate the opportunity to comment on the DEIS. If you have any questions or would like to discuss our comments, please contact Dick Clark of my staff at (303) 312-6748 or by email at clark.richard@epa.gov.

Sincerely,

/s/

for

Deborah Lebow
Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and
Remediation

enclosure

